



U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005

April 22, 2022

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Batalla Vidal, et al. v. Mayorkas, et al.*, No. 16-cv-4756 (NGG) (VMS)

Dear Judge Garaufis:

Defendants submit this letter in response to the Court's order directing them to submit "a proposed timeline for which their obligation to answer an amended complaint, if any, would be stayed." 04/04/2022 Minute Entry.

Should Plaintiffs file a fifth amended complaint, Defendants propose that their obligation to answer or otherwise respond to the amended complaint be stayed until 21 days after the Court's order on Plaintiffs' motion to clarify.

Defendants have conferred with Plaintiffs' counsel, who have indicated that Plaintiffs consent to this schedule.

Defendants thank the Court for its consideration of this matter.

Dated: April 22, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BREON PEACE
United States Attorney

BRAD P. ROSENBERG
Assistant Branch Director

/s/ Cormac A. Early
GALEN N. THORP
Senior Trial Counsel
STEPHEN M. PEZZI
CORMAC A. EARLY

SO ORDERED.

/s/ Nicholas G. Garaufis
Hon. Nicholas G. Garaufis
Date: April 26, 2022

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